

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, on behalf of herself)
and all others similarly situated,)
)
 Plaintiff,)
)
)
 v.) Civil Action No. 1:03-CV-12628 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCHI, and)
RONALD F. RICHARDS,)
)
 Defendants.)

JOHN G. ESPOSITO, JR., on behalf of)
himself and all others similarly situated,)
)
 Plaintiff,)
)
)
 v.) Civil Action No. 1:04-CV-10013 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCHI, and)
RONALD F. RICHARDS,)
)
 Defendants.)

[Captions continued on next page]

**MOTION TO CONSOLIDATE ACTIONS,
TO BE APPOINTED LEAD PLAINTIFFS AND FOR APPROVAL OF LEAD
PLAINTIFFS' SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

JOSEPH L. KING, on behalf of himself)
and all others similarly situated,)
)
)
 Plaintiff,)
)
)
 v.) Civil Action No. 1:04-CV-10038 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCH, and)
RONALD F. RICHARDS,)
)
)
 Defendants.)

MICHAEL E. CRIDEN, individually and)
on behalf of all others similarly situated,)
)
)
 Plaintiff,)
)
)
 v.) Civil Action No. 1:04-CV-10046 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, and CARL W. RAUSCH,)
)
)
 Defendants.)

ISRAEL SHURKIN and SHARON)
SHURKIN, individually and on behalf of)
all others similarly situated,)
)
)
 Plaintiff,)
)
)
 v.) Civil Action No. 1:04-CV-10055 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, and CARL W. RAUSCH,)
)
)
 Defendants.)

[Captions continued on next page]

JAMES J. NIZZO, VIRGINIA C. NIZZO,)
and CARLO CILIBERTI, on behalf of)
themselves and all others similarly situated,)
)
 Plaintiff,)
)
v.) Civil Action No. 1:04-CV-10065 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCH, and)
RONALD F. RICHARDS,)
)
 Defendants.)

BARRY BROOKS, on behalf of himself)
and all others similarly situated,)
)
 Plaintiff,)
)
v.) Civil Action No. 1:04-CV-10077 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCH, and)
RONALD F. RICHARDS,)
)
 Defendants.)

ANASTASIOS PERLEGIS, individually)
and on behalf of all others similarly)
situated,)
)
 Plaintiff,)
)
v.) Civil Action No. 1:04-CV-10078 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCH, and)
RONALD F. RICHARDS,)
)
 Defendants.)

[Captions continued on next page]

MARTIN WEBER, on behalf of himself and all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:04-CV-10090 (NG)
)	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,)	
)	
Defendants.)	
<hr/>		
BRUCE HAIMS, individually and on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:04-CV-10144 (NG)
)	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,)	
)	
Defendants.)	
<hr/>		
MODEL PARTNERS LIMITED, individually and on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:04-CV-10155 (NG)
)	
BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH, and RONALD F. RICHARDS,)	
)	
Defendants.)	

[Captions continued on next page]

JUNE E. PATENAUME, individually and)
on behalf of all others similarly situated,)
)
 Plaintiff,)
)
v.) Civil Action No. 1:04-CV-10179 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCH, and)
RONALD F. RICHARDS,)
)
 Defendants.)

NANCY L. PINKNEY and GERTRUDE)
PINCKNEY, individually and on behalf of)
all others similarly situated,)
)
 Plaintiff,)
)
v.) Civil Action No. 1:04-CV-10189 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, and CARL W. RAUSCH,)
)
 Defendants.)

W. KENNETH JOHNSON, on behalf of)
himself and all others similarly situated,)
)
 Plaintiff,)
)
v.) Civil Action No. 1:04-CV-10190 (NG)
)
BIOPURE CORPORATION, THOMAS)
A. MOORE, CARL W. RAUSCH, and)
RONALD F. RICHARDS,)
)
 Defendants.)

[Captions continued on next page]

PLEASE TAKE NOTICE that class members Neil & Susan Fincman, Michael Navilio, Robert Powell and Edward P. Collins (collectively, the "Biopure Lead Plaintiff Group"), by their counsel, hereby move this Court, for an Order: (i) appointing the Biopure Lead Plaintiff Group as lead plaintiffs; (ii) approving the Biopure Lead Plaintiff Group's selection of the law firms of Schiffren & Barroway, LLP and Cauley Geller Bowman & Rudman, LLP to serve as lead counsel; (iii) approving the Biopure Lead Plaintiff Group's selection of the law firm of Gilman and Pastor, LLP to serve as liaison counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this motion, the Biopure Lead Plaintiff Group submits herewith a memorandum of law and declaration of David Pastor.

Dated: March 1, 2004.

Respectfully submitted,

GILMAN AND PASTOR, LLP

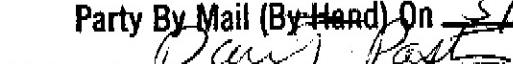
By:



David Pastor (BBO # 391000)
Peter A. Lagorio (BBO # 567379)
Stonehill Corporate Center
999 Broadway, Suite 500
Saugus, MA 01906
Telephone: (781) 231-7850
Facsimile: (781) 231-7840

Proposed Liaison Counsel

CERTIFICATE OF SERVICE

I Hereby Certify That A True Copy of
The Above Document Was Served Upon
The Attorney Of Record For Each Other
Party By Mail (By Hand) On 3/1/04


SCHIFFRIN & BARROWAY, LLP

Andrew L. Barroway
Stuart L. Berman
Darren J. Check
Three Bala Plaza East, Suite 400
Bala Cynwyd, PA 19004
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

**CAULEY GELLER BOWMAN
& RUDMAN, LLP**

Samuel H. Rudman
David A. Rosenfeld
200 Broadhollow Road, Suite 406
Melville, NY 11747
Telephone: (631) 367-7100
Facsimile: (631) 367-1173

Proposed Lead Counsel

Biopure Corporation Securities Litigation**Service List****Plaintiffs' Counsel**

Samuel H. Rudman

Russell J. Gunyan

Cauley Geller Bowman & Rudman, LLP

200 Broadhollow Road, Suite 406

Melville, NY 11747

Marc A. Topaz

Schiffrin & Barroway, LLP

Three Bala Plaza East, Suite 500

Bala Cynwyd, PA 19004

Jules Brody

Howard T. Longman

Stull, Stull & Brody

6 East 45th Street

New York, NY 10017

Nancy Freeman Gans

Moulton & Gans, P.C.

33 Broad Street, Suite 1100

Boston, MA 02109

Steven G. Schulman

Peter E. Seidman

Sharon M. Lee

Milberg Weiss Bershad Hynes & Lerach LLP

One Pennsylvania Plaza, 49th Floor

New York, NY 10119

Bruce G. Murphy

Law Offices of Bruce G. Murphy

265 Lywyds Lane

Vero Beach, FL 32963

Jeffrey C. Block

Patrick T. Egan

Berman Devalerio Pease Tabacco Burt

& Pucillo

One Liberty Square, 8th Floor

Boston, MA 02109

Steven J. Toll, Esq.

Julie Goldsmith, Esq.

Cohen, Milstein, Hausfeld & Toll, P.L.L.C.

1100 New York Avenue, N.W.

West Tower, Suite 500

Washington, D.C. 20005

Daniel L. Berger

Gerald L. Silk

Bernstein Litowitz Berger & Grossman LLP

1285 Avenue of the Americas

New York, NY 10019

Susan R. Strenger

Perkins Smith & Cohen, LLP

One Beacon Street, 30th Floor

Boston, MA 02108

Robert Harwood

Samuel K. Rosen

Wechsler Harwood LLP

488 Madison Avenue, 8th Floor

New York, NY 10022

Marc I. Gross

Pomerantz Haudek Block Grossman

& Gross LLP

100 Park Avenue, 26th Floor

New York, NY 10017

Charles Piven

Law Offices of Charles Piven

World Trade Center

401 E. Pratt Street, Suite 2525

Baltimore, MD 21202

Richard J. Vita

Law Offices of Richard J. Vita

77 Franklin Street, 3rd Floor

Boston, MA 02110

Biopure Corporation Securities Litigation

Service List

Plaintiffs' Counsel

Marvin L. Frank
Eric J. Belfi
Gregory B. Linkh
Rabin, Murray & Frank LLP
275 Madison Avenue, 8th Floor
New York, NY 10016

Mel E. Lifshitz
Bernstein Leibhard & Lifshitz, LLP
10 East 40th Street
New York, NY 10016

Susan Salvetti
Shaye J. Fuchs
Zwerling, Schachter & Zwerling, LLP
845 Third Avenue
New York, NY 10022

John G. Emerson
Scott E. Poynter
Emerson Poynter LLP
P.O. Box 164810
Little Rock, AR 72216

Jeffrey S. Marks
Marks & Artau, P.A.
2499 Glades Road, Suite 308
Boca Raton, FL 33431

Mary T. Sullivan
Segal Roitman & Coleman
11 Beacon Street, Suite 500
Boston, MA 02108

George E. Barrett
Douglas S. Johnston, Jr.
Timothy L. Miles
Barrett, Johnston & Parsley
217 Second Avenue, North
Nashville, TN 37201

James G. Stranch
Branstetter Kilgore Stranch & Jennings
227 Second Avenue, North
Nashville, TN 37201

Deborah R. Gross, Esq.
Robert P. Fruitkin, Esq.
Law Offices of Bernard M. Gross, P.C.
1515 Locust Street, 2nd Floor
Philadelphia, PA 19102

Arnold Levin, Esq.
Levin Fishbein Sedran & Berman
510 Walnut Street, Suite 500
Philadelphia, PA 19106

David Jaroslawicz, Esq.
Jaroslawicz and Jaros
150 William Street, 19th Floor
New York, NY 10038

Curtis V. Trinko
Law Offices of Curtis V. Trinko, LLP
16 West 46th Street, 7th Floor
New York, NY 10036

Laurence D. King
Kaplan Fox & Kilsheimer
555 Montgomery Street, Suite 1501
San Francisco, CA 94111

Frederic S. Fox
Joel B. Strauss
Hae Sung Nam
Kaplan Fox & Kilsheimer
805 Third Avenue, 22nd Floor
New York, NY 10022

Biopure Corporation Securities Litigation

Service List

Plaintiffs' Counsel

Mary T. Sullivan
Segal Roitman & Coleman
11 Beacon Street, Suite 500
Boston, MA 02108

Brian J. Robbins
Jeffrey P. Fink
Robbins Umeda & Fink, LLP
1010 Second Avenue, Suite 2360
San Diego, CA 92101

Richard A. Lockridge
Karen Hanson Reibel
Lockridge Grindal Nauen P.L.L.P.
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401

Jack G. Fruchter
Fruchter & Twersky
One Penn Plaza, Suite 1910
New York, NY 10019

Jonathan M. Plassc
Christopher J. Keller
Goodkind Labaton Rudoff & Sucharow
100 Park Avenue, 12th Floor
New York, New York 10017